

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

THE UNITED STATES OF AMERICA and)	
)	
THE STATE OF ILLINOIS)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:15cv50250
)	
THE CITY OF ROCKFORD, ILLINOIS,)	
)	
)	
Defendant.)	
_____)	

**CONSENT DECREE
APPENDIX H**



INDUSTRIAL HIGH RISK RUNOFF FACILITY INSPECTION PROGRAM

STANDARD OPERATING PROCEDURES

June 2015

1.0 General

The goal of this standard operating procedure is to reduce the amount of polluted runoff from industrial and commercial facilities entering the City of Rockford's MS4. This industrial high risk runoff inspection program complies with Part II, A, 9 of the City of Rockford's NPDES Storm Water Permit (ILS000001). This document addresses how industrial facilities are identified for inspections and the procedures for performing them.

2.0 Legal Authority

Legal authority for the Industrial High Risk Runoff Inspection program is found in the City of Rockford's Code of Ordinances Chapter 109, Article 12. This Chapter of the City of Rockford Code provides City staff the authority to access properties for inspections.

3.0 Staffing

Staff from the Department of Public Works shall be responsible for performing inspections at industrial, commercial and other high risk facilities to ensure that these facilities are in compliance with the City of Rockford's Code of Ordinances Chapter 109, Article 12. Each team member shall be trained to perform the inspections as referenced in the ILR00 industrial stormwater permit and shall be familiar with this document. The primary public works staff trained to perform industrial inspections shall be the following positions: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Project Manager, Stormwater Coordinator and designated project Managers and Engineering Techs. Each shall be trained in performing industrial inspections from in-house and external training sources as approved by the Engineering Operations Manager and the Stormwater Program Manager(s). Project Managers and Engineering Technicians can perform inspections provided they have the above training and are approved to perform inspections by the Engineering Operations Manager and the Stormwater Program Manager(s).

All training shall be in accordance with the Standard Operating Procedures for Stormwater and Environmental Education.

The following equipment may be utilized when performing inspections: a copy of the SWPPP and SPCC for the site if available (if copies cannot be obtained beforehand they shall be reviewed onsite), clipboard, inspection form, camera, sampling supplies, personal protection equipment. Personal protection equipment shall include:

- Hard hats – as required by the industrial facility.
- Safety vests – as required by the industrial facility
- Work boots
- Safety glasses - as required by the industrial facility

Safety while doing any inspection is a top priority. Staff should always be aware of their surroundings as well as the location of equipment operating in the area.

4.0 Inspection Frequency and Priority

Inspections may be scheduled in advance or without prior notice. Inspections shall be prioritized based on the following:

Inspection Priority		Approx. # of Facilities	Priority Ranking
Citizen Complaints and Staff Observations			High
Flows recorded during outfall Inspections & tracked to an industrial facility & past compliance concerns within the past 3 years.			High
Municipal Facilities (see attachment B for list of municipally owned facilities and priority ranking)	List categories of high priority facilities (e.g., vehicle maintenance)	2	High
	List categories of medium priority facilities	2	Medium
	List categories of low priority facilities (e.g., municipal buildings)	80	Low
Facilities requiring an IEPA industrial Stormwater permit based on SIC and ILR00	Facilities with approved permit	57	Medium
	Unpermitted facilities - Food Manufacturing (SIC starting at 20)	17	Medium
	Unpermitted facilities - Textile & Apparel products & manufacturing (SIC starting at 22,23)	18	Low
	Unpermitted facilities – Wood & paper manufacturing facilities (SIC starting at 24, 25)	17	High
	Unpermitted facilities – Wood, paper & Printing facilities (SIC starting at 27)	52	Low
	Unpermitted facilities – Chemical & Petroleum related industries (SIC Starting at 28, 29)	32	High
	Unpermitted facilities – Rubber, leather & glass products. (SIC starting at 30, 31, 32)	32	Low
	Unpermitted facilities – Metal fabrication Industries (SIC starting at 33, 34, 35)	293	High
	Unpermitted facilities – Electronic & transportation equipment (SIC starting at 36, 37, 38)	46	Low
	Unpermitted facilities – Miscellaneous Manufacturing (SIC starting at 39)	27	Low
	Unpermitted facilities – Transportation and trucking services, USPS (SIC starting at 41, 42, 43)	153	Low
	Unpermitted facilities – Recycling Facilities (SIC starting at 5015, 5093)	8	High
	Facilities with No Exposure Certifications	60	Low
Facilities that do not required an IEPA industrial Stormwater permit	Commercial Fueling Stations	66	Medium
	Laundry and dry cleaning facilities	20	Medium
	Car repair shops and car washes	159	Medium
	Retailers with lawn & garden centers	8	Medium
	Large & Small retailers	75	Low
	Landscapers	37	Low
	Restaurants	596	Low
	Other facilities as determined by the City	-----	TBD

The City shall inspect 100% high priority facilities and 50% medium priority facilities once every permit term. The City shall continue to evaluate the database using desktop analysis to determine if a facility's Standard Industrial Classifications (SIC) are appropriate, if it is still operational and within City limits. Citizen complaint inspections will be in addition to the scheduled inspections. Low priority facilities shall not be inspected unless there is a complaint submitted or an issue referred by another public entity such as the County Health Department or the RRWRD. The facility inventory and prioritization will be evaluated annually and revised where appropriate based on inspection findings and desktop analysis. New facilities will be added when identified. Changes will be summarized each year in the Annual Report.

Once all high and medium priority facilities have been reviewed new inspections on the facilities shall commence.

Complaints from the public shall be recorded and investigated. The City has a citizen complaint program which includes a hotline (779-348-7300) for phone calls and the City's website (www.rockfordil.gov) to register a complaint. Calls to the hotline shall be forwarded to the Stormwater & Environmental Program Manager or the Stormwater Project Manager. The same positions are sent emails for online complaints.

Citizen complaints shall be followed up with a field inspection by City staff within 72 hours of the complaint being submitted. Citizen complaints may initially be investigated as an Illicit Discharge Investigation (see Illicit Discharge and Detection and Elimination Standard Operating Procedures. If an industrial inspection is warranted procedures in Section 6.0 shall be followed. Priority ranking and inspection frequency may be adjusted based on inspection results if necessary.

5.0 Identification of Industrial High Risk Runoff Facilities

The City utilizes the following resources to build and update their industrial facility database for performing inspections. Updated data shall be incorporated into the existing database and mapping. This database shall be updated annually and changes referenced in the annual report. Mapping of industrial facility locations shall be updated at the same time as the database. See Appendix A for contacts to the listed organizations

5.1 Rock River Water Reclamation District

The Rock River Water Reclamation District {RRWRD} requires that all significant industrial users that wish to connect to the Publicly-Owned Treatment Works (POTW) obtain a wastewater discharge permit prior to connecting or discharging to the POTW. This information is maintained by the RRWRD in their customer database.

5.2 NPDES Permitted Facilities

The Illinois Environmental Protection Agency (IEPA) issues NPDES permits to industrial facilities (based on SIC code) and maintains information on permitted sites on their website. The City will work with the local office of the Illinois Environmental Protection Agency to review its list of permitted sites or utilize the website below to make sure all NPDES permitted sites have obtained the proper City of Rockford approvals. This website shall be reviewed quarterly and the database updated as needed. (<http://dataservices.epa.illinois.gov/NoticesofIntent/IndustrialQuickSearch.aspx>)

Since IEPA does not list "No Exposure" certifications on their website the City shall request an updated list annually from IEPA.

5.3 Sara Title III and EPCRA Reporting (Toxic Release Inventory)

The City reviews the USEPA's Toxic Release Inventory (TRI), which requires facilities to submit data annually. This inventory shall be reviewed to determine what facilities within Rockford City limits have submitted reports and to add them to the database if necessary. (<http://www.epa.gov/tri/index.htm>).

5.4 City of Rockford Fire Department

The City of Rockford Fire Department maintains a database of industrial facilities with hazardous materials (Tier II reporting to Illinois Emergency Management Agency). An updated copy of this shall be requested annually and the database updated as needed.

5.5 City of Rockford Water Division

That City of Rockford Water Division shall provide a list of non-residential (more than one unit) users annually. This list can be used to determine existing facilities using water and further to identify any industrial activity not otherwise captured for prioritization. This list shall be updated annually.

5.6 Winnebago County Health Department

The Winnebago County Health Department maintains a list of permanent food establishments in Winnebago County. The City shall request an updated copy annually and update its database as needed.

5.7 Illinois Department of Agriculture – Motor Fuel Dispenser Information for Businesses

The City utilizes the Illinois Department of Agriculture's database to determine the locations of licensed fueling stations within City limits. This report is updated annually. (<http://www.agr.state.il.us/programs/consumer/w&m/index.html>)

5.8 City Owned Facilities

The database shall include City owned facilities which use or store pollutants or implement activities that may pose a threat to water quality. These facilities shall include, but are not limited to: city yards including vehicle storage and maintenance facilities, well houses, pesticide storage facilities, the compost facility, publicly owned parking lots, and City owned public buildings. While IEPA has confirmed that stormwater discharges from the city yards do not require authorization under a NPDES permit, the City shall develop a stormwater plan establishing best management practices for that site and shall evaluate that plan annually for potential improvements to best management practices and efficiencies to operations. Changes to the plan shall be summarized in the Annual Report. All other facilities shall maintain Stormwater Pollution Prevention Plans or Spill Prevention Control and Countermeasure plans if required through state or federal requirements.

Well houses are inspected daily by the Water Division for chemical leaks and other issues per Water EPA requirements. All other City owned facilities shall be inspected based on their priority rank. See Appendix B for a list of City owned facilities and their priority ranking.

6.0 Performing Industrial High Risk Runoff Inspections

The Industrial Survey Storm Water Compliance form (Appendix C) shall be completed during the inspection and any noticeable issues addressed with the facility supervisor during an exit interview. The inspector should review all areas of a facility that could impact water quality through stormwater runoff or illicit discharges. During the inspection, City inspectors shall complete the following steps:

- 1) For facilities requiring NPDES Industrial stormwater permitting, an appointment shall be made with the site representative. This is to ensure the appropriate person is onsite and available. For facilities that do not require an industrial stormwater permit unscheduled inspections are preferred.
- 2) If scheduling, obtain a copy of the facilities Stormwater Pollution Prevention Plan (SWPPP) for review in advance of the inspection. If it is not available the SWPPP shall be reviewed during the inspection.
 - a. Review the facilities standard industrial classification (SIC) and confirm a SWPPP or No Exposure certification is required.
 - b. If permitting is required confirm SWPPP is up to date and/or confirm the facility qualifies for the No Exposure certification.
 - c. Review required inspection reports.
 - d. If a facility does not have a permit/SWPPP as required discuss with site manager the permit requirements and determine a timeframe to develop a SWPPP. These facilities shall be referred to the IEPA in a timely manner.

- 3) Review the interior and/or exterior of the facility as needed utilizing the attached inspection report (Appendix C).
 - a. Any items in the visual survey section of the inspection report marked “no” shall be reviewed with the site manager with possible corrective actions discussed.
 - b. Photos may be taken if possible and not against the facility’s policy.
 - c. Review the facilities discharge point(s) as indicated on the SWPPP. If the discharge point is not indicated the inspector shall determine the discharge point (i.e. storm drain inlets, where the facilities storm sewer enters the City’s right-of-way, an adjacent drainageway, property perimeter etc.). See Table 1 for common discharges produced at generating sites.
 - d. Ensure floor drains are not connected to the stormsewer system.
- 4) Indicators of potential illicit discharges from a facility include:
 - a. Odors (gas, sewer, rancid/sour, etc.)
 - b. Deposit/stains (oily, flowline, paint, etc.)
 - c. Pipe Benthic growth
 - d. Dry weather discharges from the facility to the storm sewer system
 - e. Other potential indicators can be found in the Illicit Discharge and Elimination standard operating procedures.
- 5) If an indicator of illicit discharges is present the City may:
 - a. If sampling of the questionable discharge is required by the facility’s NDPES permit, verify that sampling is being completed and request test results.
 - b. If sampling is not required or being completed for the particular discharge in question, or the City questions the accuracy of the facility’s test results, the City can request additional sampling to confirm tests. Inspectors shall observe sampling to verify location of sample taken.
 - c. Utilize the City’s field testing equipment and follow the monitoring standard operating procedures. Sample types shall be based on the type of facility.
 - i. Sampling may need to be completed upstream of the site to verify the source of suspected illicit discharge.
 - ii. If an illicit discharge is not from the facility, initiate an illicit discharge investigation as detailed in the Illicit Discharge Detection and Elimination standard operating procedures.
 - d. If test results indicate presence of contaminants including exceedances of NDPES permit limits, contact IEPA and City legal department to discuss enforcement.
 - e. Require facility to implement temporary and/or permanent best management practices based on their response plans and as approved by the City to control or eliminate the contaminant.
 - f. Perform subsequent field test to confirm that discharge has been managed appropriately.
 - g. All documents, sampling results and conversations shall be saved as indicated later in this document.
- 6) Letters shall be sent to all NPDES permitted facilities detailing inspection findings and timeframes for performing corrective actions (see sample letter in Appendix D). A copy of this letter shall also be emailed to the Illinois EPA Rockford office (see Appendix A for contact information). For facilities that do not require NPDES permitting, letters shall only be sent if there are corrective actions.

Table 1: Common Discharges Produced at Generating Sites

Generating Site	Activity Generating the Discharge
Vehicle Operations (Maintenance, Repair, Fueling, Washing, Storage)	<ul style="list-style-type: none"> • Improper disposal of fluids down shop and storm drains • Spilled fuel, leaks and drips from wrecked vehicles • Hosing of outdoor work areas • Wash water from cleaning • Spills
Outdoor Materials (Loading/Unloading, Outdoor Storage)	<ul style="list-style-type: none"> • Liquid spills at loading areas • Hosing/washing of loading areas into shop storm drains • Leaks and spills of liquid stored outside
Waste Management (Spill prevention and response, Dumpster management)	<ul style="list-style-type: none"> • Spills and leaks of liquids • Dumping into storm drains • Leaking dumpsters
Physical Plant Maintenance (Building repair, Remodeling and maintenance, Parking lot maintenance)	<ul style="list-style-type: none"> • Discharges from power washing steam cleaning • Rinse Water and wash water discharges during clean up • Runoff from degreasing and re-surfacing
Turf and Landscaping (Turf Management Landscaping/rounds care)	<ul style="list-style-type: none"> • Non-target irrigation • Improper rinsing of fertilizer/pesticide applicators
Unique Hotspot Operations (pools, Golf Courses, Marinas, Construction, restaurants, Hobby Farms)	<ul style="list-style-type: none"> • Discharge of chlorinated water from pools • Dumping of sewage and grease.

7.0 Enforcement

Enforcement measures shall be in accordance with Chapter 109, Article 13 and the City of Rockford Storm Water Division Enforcement Response Plan for corrective actions not remedied within the required timeframe.

8.0 Documentation and Record Management

Hard copies of site data (inspection reports and letters) will be filed by address in file folders. In addition, digitized copies will also be saved in the Stormwater Drive on the City of Rockford computer system. Digitized information may include: SWPPP, inspection reports/checklists, letters, photos, correspondence, etc. These files will be saved as follows:

- 1) Open the Stormwater Drive (note: this drive has limited access for people who perform duties directly related to the City's stormwater program),
- 2) Open the IHRRI folder,
- 3) Open the IHRI Inspections folder,
- 4) Open the inspection folder for the current year,
- 5) Inspections shall be saved by address and facility name.
- 6) If a folder for a site is already created open it and save the data. Inspection reports should be saved by date. If it is a new site create a new folder.

Any industrial facility site where inspections carry over to the next year shall have the entire digitized inspection folder copied and pasted to the next year. All hard copy inspections shall be saved in the same file.

An excel spreadsheet for all inspections has also been created. This spreadsheet can be found in the Stormwater Drive in the folder entitled ***Inspection and Sampling Logs***. All spreadsheets are saved by year for easy tracking. Data includes: date, facility name and address, SIC number, NPDES permit # (if applicable), type of follow-up needed, date of follow-up and whether corrective actions have been addressed. Notes about the inspection can also be included.

Appendix A

Database Contacts

<u>Company</u>	<u>Name</u>	<u>Phone #</u>	<u>Email</u>	<u>Website</u>
Rock River Water Reclamation District	Barb LeMoine	815-387-7636	BLeMoine@rrwrd.dst.il.us	
City of Rockford Fire Department	Ken Eitenmiller – Hazardous Materials Chief	779-348-7171	Ken.eitenmiller@rockfordil.gov	
	Matt Knott – Division Chief	779-500-6537	Matt.knott@rockfordil.gov	
City of Rockford Water Division	Tim Holdeman	779-348-7355	Tim.holdeman@rockfordil.gov	
Illinois EPA	Melissa Parrott (Springfield)	217-782-0610	Melissa.Parrott@Illinois.gov	http://dataservices.epa.illinois.gov/NoticesofIntent/IndustrialQuickSearch.aspx
	Thomas Williams (Rockford)	815-987-7760	Thomas.williams@Illinois.gov	
Winnebago County Health Department (may need to submit FOIA)	Lisa Sprecher	815-720-4117	lsprecher@wchd.org	
Sara Title III and EPCRA Reporting	List only			http://www.epa.gov/tri/index.htm
Illinois Department of Agriculture	List only			http://www.agr.state.il.us/programs/consumer/w&m/index.html

Appendix B**PROPERTIES OWNED BY CITY OF ROCKFORD, ILLINOIS**

Name	Type	Address	Priority Ranking
Armory	Vacant Development Prop	613 N Main Street	Low
Shopstead	Leased Retail Space	1012 S Main Street	Low
City Yards Admin	City Operations Location	523 S Central Ave	Low
City Yards Shop	Mechanic Shop	523 S Central Ave	High
City Yards Traffic	City Operations Location	523 S Central Ave	High
Water Division	Water Operations Location	1111 Cedar Street	Medium
City Hall	City Operations Location	425 E State Street	Low
Fire Administration/911	City Operations Location	201 S 1ST Street	Low
Fire Station 1	Fire station	528 Woodlawn Avenue	Low
Fire Station 2	Fire station	1004 7th Street	Low
Fire Station 3	Fire station	1520 S. Main Street	Low
Fire Station 4	Fire station	2959 Shaw Woods	Low
Fire Station 5	Fire station	391 Trainer Road	Low
Fire Station 6	Fire station	3329 W State Street	Low
Fire Station 7	Fire station	4979 Falcon Road	Low
Fire Station 8	Fire station	505 Sherman	Low
Fire Station 9	Fire station	2416 Halstead	Low
Fire Station 10	Fire station	3407 Rural	Low
Fire Station 11	Fire station	2117 Calgary	Low
Coronado Theater	Theater	312-314 N Main Street	Low
Ingersoll	Vacant Development Prop	301 S Water Street	Low
Fire Repair Shop	Mechanic Shop	2323 Sawyer Road	Medium
Human Services	City Operations Location	625 N Church Street	Low
PSB Overnight Parking	Open Lot Vehicles	420 W State Street	Low
Concourse Overnight Parking	Open Lot Vehicles	322 S Church	Low
Yards Overnight Parking	Open Lot Vehicles	400 S Independence	Low
Plant		Stanley St. south of Preston	Low
Group 1	Group well-no bldg	Cedar & Tay St's	Low
Group 2	Group well-no bldg	Cedar & Stanley St's	Low
Group 5	Group well-no bldg	Preston & Tay St's	Low
Group 6	Group well-no bldg	Chestnut & Tay St's	Low
Well 3	Base Well	1404 Riverbluff Blvd.	Low
Well 4	Land to be sold	801 Marchesano Dr.	Low
Well 5 - 5A	Treatment plant	2526 Pelham Rd.	Low
Well 6	Base Well	2604 19th Ave.	Low
Well 9A	Secondary Well	2708 Crosby St.	Low
Well 10	Treatment plant	4316 Newburg Rd.	Low
Well 11	Land to be sold	1218 7th Ave.	Low
Well 12	Land to be sold	1022 Benton St.	Low
Well 13	Treatment plant	4625 Skyline Dr.	Low
Well 15	Zone Control Valve	3030 Chestnut St.	Low
Well 16	Land to be sold	4550 Harrison Ave.	Low
Well 17	Secondary Well	3700 Brookview Rd.	Low
Well 18	Base Well	1409 S. Johnston Ave.	Low
Well 19	Used for storage only	1220 Lockheed Lane	Low
Well 20	Land to be sold	2434 N Central Ave.	Low
Well 21	Base Well	703 Daisyfield Rd.	Low

City of Rockford

Standard Operating Procedures for Industrial
High Risk Runoff Inspection Program

Well 22	Base Well	5110 Auburn St.	Low
Well 23	Secondary Well	1206 Elmwood Rd.	Low
Well 24	Base Well	6475 Cessna Dr.	Low
Well 25	Secondary Well	5602 Springcreek Rd.	Low
Well 26	Secondary Well	5516 E State St.	Low
Well 27	Land to be sold	5834 Guilford Rd.	Low
Well 28	Secondary Well	5400 Kishwaukee Rd.	Low
Well 29	Treatment plant	4750 Pepper Dr.	Low
Well 30	Treatment plant	6544 Palo Verde	Low
Well 31	Treatment plant	1780 Bell School Rd.	Low
Well 33	Used for storage only	930 Arthur Ave.	Low
Well 34	Base Well	3945 Dawes Rd.	Low
Well 35	Secondary Well	2944 Bildahl St.	Low
Well 36	Treatment plant	4141 Samuelson Rd.	Low
Well 37	Base Well	2100 Huffman Blvd.	Low
Well 39	Secondary Well	7423 Springbrook Rd.	Low
Well 40	Treatment plant	788 Lyford Rd.	Low
Well 42	Treatment plant	6733 Newburg Rd.	Low
Well 43	Treatment plant	3447 Publishers Dr.	Low
Well 44	Base Well	5250 Owen Center Rd.	Low
Well 45	Base Well	1141 Cedar St.	Low
Tank T-02	Elevated Tank	2310 Wentworth Ave	Low
Tank T-05	Elevated Tank	Christopher Drive	Low
Zone Control Valve-01	Zone Control Valve	Spring Creek & Springdale	Low
Zone Control Valve-02	Zone Control Valve	5701 Strathmoor Dr	Low
ZCV-03	Zone Control Valve	N Mulford & Mulford	Low
ZCV-04	Zone Control Valve	Village Dr	Low
ZCV-05	Zone Control Valve	738 Lyford Rd	Low
ZCV-06	Zone Control Valve	Highcrest & Spring Creek	Low
ZCV-07	Zone Control Valve	Crosby St & Dawson Ave	Low
ZCV-09	Zone Control Valve	Harrison Ave & 22nd St	Low
	Zone Control Valve	3030 Chestnut St.	Low
	Inter-zone booster station	Guilford & Fairview	Low
	Inter-zone booster station	Alpine & E State	Low
	Inter-zone booster station	Broadway & Eastgate Pkwy	Low
	Inter-zone booster station	Sandy Hollow & 20th St	Low
	Inter-zone booster station	Elmwood Rd	Low
	Inter-zone booster station	Samuelson Rd	Low

Appendix C

Industrial Survey Storm Water Compliance Form

COMPANY NAME		DATE
TELEPHONE		FAX
ADDRESS		CITY, ZIP
MAILING ADDRESS (if different from site address)		MAILING CITY, ZIP
CONTACT		TITLE EMAIL/PHONE NUMBER
FACILITY #	SIC CODE	Does the facility have a NPDES industrial storm water permit or a 'No Exposure' Exemption? (circle one) Yes No Is the SWPPP available or review? Yes No NA
DAYS OF WEEK FACILITY CONDUCTS BUSINESS (CIRCLE): Sun Mon Tues Wed Thurs Fri Sat Hours of Operation: _____		
Weather Conditions: <input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snowing <input type="checkbox"/> High Winds <input type="checkbox"/> Other: Temperature: _____		
Briefly describe the principal activities that occur on-site including all manufacturing and/or services provided. _____		
Are any vehicles serviced or washed/cleaned at this facility? (circle one) Yes No If yes, is this performed indoors or outdoors? _____		
Does the waste drain to (circle one): Rockford sanitary sewer Dry well Storm sewer 100% recycled Collected for off-site disposal		
Are any materials/products stored outdoors (i.e. chemicals, equipment, tanks, drums, barrels, etc.)? If Yes what is the material? _____, Where is it stored? _____ How is it stored? (pallets, undercover, etc.) _____		
Do you use or store liquid chemicals in quantities of 25 pounds or more? (circle one) Yes No If yes, is this indoor or outdoor storage? If outdoors, where and how? _____		
If Yes what is the chemical? _____ Is there secondary containment? (circle one) Yes No		
Proximity to water bodies, drainageways and inlets? Do you use or store dry chemicals in quantities of 500 pounds or more? (circle one) Yes No If yes, is this indoor or outdoor storage? If Yes what is the chemical? _____		
Does the facility generate any wastewater excluding domestic wastewater? (circle one) Yes No If yes, please describe the wastewater. (circle all that apply) Boiler blowdown Noncontact cooling water Process water Remediation water Cooling tower blowdown Wash water (vehicle, equipment, etc.) Other _____		
Is this wastewater discharged to the Rockford sewer system? (circle one) Yes No Unknown		

Standard Operating Procedures for Industrial
High Risk Runoff Inspection Program

VISUAL SURVEY	YES	NO	N/A
GENERAL – Are regular housekeeping practices carried out? Are good housekeeping procedures and reminders posted in appropriate locations?			
SPILL CONTAINMENT - Are appropriate spill containment and cleanup materials kept on-site and in convenient locations and are staff familiar with these locations and use of the material?			
EQUIPMENT - Is exposed piping and process equipment regularly inspected and/or tested to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters?			
OUTSIDE AREAS (Free of staining & debris; exhibits good housekeeping; maintained in a manner to prevent runoff)			
CHEMICAL STORAGE – The outside storage area is kept to minimize the possibility of a release. Chemicals/materials are protected from precipitation/storm water runoff and the containers show no signs of leaking.			
DUMPSTERS – No liquids are leaking from the dumpster; surrounding area is free of trash. Distance from water bodies, inlet and drainageways. _____			
ABOVEGROUND STORAGE TANKS – No ground staining, no spillage observed and no discharge to storm drain. Tanks are maintained to minimize the possibility of a release (secondary containment).			
ONSITE STORM DRAIN – Protected from accidental discharge other than water.			
POWER WASH OR STEAM CLEAN - (discharge to sewer) Drains to oil/water separator connected to a sanitary sewer and not a septic system. Steam cleaning not discharged to parking lot, storm drain or soil.			
PARKING LOT/DRIVEWAY – Free of excess trash, chemical staining or liquids other than water.			
Indicators are not present to suspect an illicit discharges or connections? If answered “no” list indicators:			
MOP WATER TO SANITARY SEWER VIA CLARIFIER – Mop water is not dumped to the soil, parking lot, gutter, or other areas susceptible to storm water drainage.			
OTHER – Non-storm water discharge (i.e. non-hazardous process discharge)			
OVERALL EVALUATION/COMMENTS:			

Inspector Signature: _____ Date: _____

Appendix D



*Timothy Hanson
Director
Public Works Department*

July 8, 2013

(Insert name & address of
Permit holder contact)

RE: Industrial Inspection at (insert facility name) (ILR00 insert permit # if applicable)

Dear Mr. /Ms. ;

An industrial inspection for stormwater compliance was conducted on (insert date) by the City of Rockford. The purpose of the inspection was to determine if stormwater pollution prevention measures are adequate for the site and to determine if the site was in compliance with the City of Rockford's Code of Ordinances.

The inspection identified the following items needing corrections to comply with your IEPA Industrial Stormwater Permit and Chapter 109 of the City of Rockford Code of Ordinances:

- 1.
- 2.

I have included a copy of the IEPA industrial stormwater permit for your review and implementation. I have also included a link to the IEPA website which details the industrial permitting requirements as well as sample SWPPP's. (<http://www.epa.state.il.us/water/permits/storm-water/industrial.html>)

Please update the City via phone or email within 30 days to review your progress in completing the above items. Failure to contact the City shall result in enforcement measures as indicated in Chapter 109 and the City's Stormwater Division Enforcement Response Plan.

If you have any questions regarding this inspection please contact our Storm Water and Environmental Program Manager, Brad Holcomb, at (815) 967-7061 or email at brad.holcomb@rockfordil.gov.

Sincerely,

Matthew Vitner, P.E.
City Engineer

Timothy Hanson
Director
Public Works Department



Industrial Stormwater Inspection at (insert facility name) (ILR10 insert permit #)

Page 2 of 2

Photo #1

Picture description

Photo #2

Picture description

Photo #3

Picture description

***Note: Approval may
be needed from the
facility prior to taking
photos.***

Note: the attached photos indicate examples of corrective actions observed on this construction site. When performing maintenance as indicated in the photos, check the entire site for other areas with similar maintenance needs.

